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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In The Matter Of	MM Docket No. _____
Amendment of Section 73.606 Table of Allotments Television Broadcast Stations (Olympia, WA)	RM No. _____

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Sonoma Media Corporation, Inc. ("Sonoma"), by its counsel, hereby submits its petition for rule making for a change in the television table of allotments at Olympia, WA, to substitute channel 53 for channel 67. Sonoma proposes to amend Section 73.606 of the Commission's rules as follows:

	Channel No.	
City	**Present**	**Proposed**
Olympia, WA	67	53

I. Background

1. Sonoma is filing this petition for rule making pursuant to the Commission's Public Notice, 14 FCC Rcd 19559 (1999) ("Window Notice") announcing the opening of a window for the filing of, among other things, petitions for rule making seeking a new channel below channel 60 for applicants with pending applications for new full-service NTSC television stations on channels 60 – 69. Sonoma is the sole applicant for Ch. 67 at Olympia (BPCT-19960920YJ).

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2. The Commission cannot grant Sonoma's application for channel 67 because the Commission has reallocated channels 60 to 69 to non-broadcast services. As a result, under the Window Notice, Sonoma was afforded the opportunity to file the instant petition for rule making to specify a new channel. As indicated in the attached Engineering Statement of WES, Inc., the proposed allotment is free of any short-spacings to all NTSC stations, does not cause any interference to any Class A stations and is clear of all interference above the FCC's guidelines to the sole digital station to which it is short-spaced (Ch. 50, Bellevue, WA).

II. The Public Interest Compels Grant of This Petition

3. The applicant must change from channel 67 in Olympia, Washington to NTSC channel 53 because of the FCC mandated elimination of television channels 60 through 69. When it originally allocated channel 67 to Olympia, the Commission determined that allotment of a channel at Olympia will promote the objectives of Section 307(b) of the Communications Act of providing a fair, efficient, and equitable distribution of television broadcast stations among the various states and communities. See National Broadcasting Co. v. U.S., 319 U.S. 190, 217 (1943) (describing goal of Communications Act to "secure the maximum benefits of radio to all the people of the United States"); FCC v. Allentown Broadcasting Co., 349 U.S. 358, 359-62 (1955)(describing goal of Section 307(b) to "secure local means of expression").

III. Conclusion

Wherefore, Sonoma Media Corporation, Inc. respectfully requests that the Commission initiate a rule making proceeding to amend Section 73.606 of its rules, the television Table of Allotments, to substitute channel 53 for channel 67 at Olympia, Washington.

Respectfully submitted,

Law Offices
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August 17, 2000

SONOMA MEDIA CORPORATION, INC.

By _____
James L. Oyster
Counsel

WES, INC.
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505-589-2224

ENGINEERING EXHIBIT
PETITION TO MODIFY THE TABLE OF ALLOTMENTS TO SPECIFY A DISPLACEMENT CHANNEL TO SUBSTITUTE FOR OLYMPIA WA CHANNEL 67

July 13, 2000

ENGINEERING STATEMENT

DECLARATION

I, Keith J. Leitch declare and state that I am a Certified Broadcast Engineer, by the Society of Broadcast Engineers, and my qualifications are a matter of record with the Federal Communications Commission, and that I am an engineer in the firm of Wes, Inc., and that the firm has been retained to prepare an engineering statement on behalf of Sonoma Media Corporation, Inc.

All facts contained herein are true to my knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. All Exhibits were prepared by me or under my supervision. I declare under penalty of perjury that the foregoing is true and correct.

Keith J. Leitch

Executed on the 13th day of July, 2000

Narrative Statement

I. GENERAL

This engineering report has been prepared on behalf of Sonoma Media Corporation in support of its request for a displacement channel (Channel 53) for its pending application for Channel 67 in Olympia, WA (BPCT960920YJ)

II. ENGINEERING DISCUSSION

The applicant originally applied for a construction permit for channel 67 in Olympia, WA. The applicant is precluded from going on channel 67 due to the FCC mandated elimination of television channels 60 through 69.

The applicant proposes Olympia, WA city-center coordinates:

North Latitude: 47° 02' 17"
West Longitude: 122° 53' 58"

It is proposed to amend Section 73.606(b) of the Commission's rules, NTSC Table of Allotments, to allot Channel 53 (704-710 MHz) for the NTSC television operation of Sonoma Media Corporation, Inc. As demonstrated below, the proposed Channel 53 NTSC operation at Olympia, WA, will not cause any harmful interference t any other analog NTSC or DTV station or allotments exceeding the Commission's guidelines. As a maximum service facility, Olympia, Washington Channel 53 would provide additional service to a population of 2,881,925 people.

Analog NTSC TV Allocation Situation

The attached Exhibit RM-2 demonstrates that Channel 53, Olympia, Washington, **is free of any short-spacings to all NTSC stations**.

Class A Situation

The applicant does not cause any interference to any Class A Stations. The applicant is free of all prohibited overlap to all Class A stations.

DTV Allocation Situation

The attached exhibit RM-1 lists all U.S. digital stations within 429 km of the proposed channel 53 in Olympia, WA. The applicant is spaced 87.1 kilometers from Bellevue, WA digital channel 50, a short spacing of 9.5 kilometers. According to the Commission's own Fortran Longley-Rice program, Bellevue receives zero population interference from the proposed Olympia Channel 53 (see Exhibit FLR-1). Channel 53 in Olympia does not receive any interference from any digital stations as demonstrated in Exhibit FLR-2. Olympia Channel 53 is also fully spaced from all Canadian Digital Television allotments.

III. Summary

The applicant must change channel from Channel 67 in Olympia, Washington to NTC channel 53, because of the FCC mandated elimination of television channels 60 through 69. On channel 53, Olympia is clear of all interference above the FCC's guidelines to all U.S. NTSC, Digital and Class A stations.

Exhibit RM-1
Olympia, WA

July 13, 2000

by WES, Inc. Broadcast Consultants

Spacing study to DTV on newly proposed channel 53

Study Location:
Olympia, WA Channel 53

NTSC Study Station, Transmitter Coordinates: 47-2-17 N 122-53-58 W

Study distance: 429 km

NTSC TO DTV STUDY RESULTS

City of License	ST	Chan	Bearing	Distance	Req.Dist	Diff.
Bellevue	WA	50	53.49	87.06	96.60	-9.54

Station is short-spaced to 1 stations.

Exhibit RM-2
Olympia, WA

July 13, 2000
by WES, Inc. Broadcast Consultants

Spacing study to NTSC TV on newly proposed channel 53

****** TV CHANNEL SPACING STUDY ******

Job title: Olympia, WA
Channel: 53
Database file name: tv000117.edx

Latitude: 47 2 17
Longitude: 122 53 58

CH	Call	Record No.	City	ST	Z	STS	Bear.	Dist.	Reqd. Dist.	Result
56o	KWDK	14874	TACOMA	WA	2	C	7.0	57.1	31.4	25.7
67o	ALLOTM	14879	OLYMPIA	WA	2		42.8	1.1	95.7	
67o	NEW	14880	OLYMPIA	WA	2	A	42.8	1.1	95.7	

****** End of channel 53 study ******

Exhibit FLR-1
Olympia, WA Channel 53
July 13, 2000

Fortran Longley-Rice Interference Study
by WES, Inc. Broadcast Consultants

Study run without Olympia, WA Channel 53

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Run begins Thu Jul 13 15:06:58 2000, host providence
Analysis of: 50A WA BELLEVUE
   HAAT  719.0 m, ATV ERP  240.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      3103536      32965.4
   not affected by terrain losses    3052979      28402.4
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV            0          0.0
   lost to ATV IX only                     0          0.0
   lost to all IX                          0          0.0

Finished Thu Jul 13 15:09:34; run time    0:02:23
      8206 calls to Longley-Rice; path distance increment  1.00 km
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Study with Olympia, WA Channel 53 added at 5,000 kW omni-directional:

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Run begins Thu Jul 13 15:28:12 2000, host providence
Analysis of: 50A WA BELLEVUE
   HAAT  719.0 m, ATV ERP  240.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      3103536      32965.4
   not affected by terrain losses    3052979      28402.4
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV            0          0.0
   lost to ATV IX only                     0          0.0
   lost to all IX                          0          0.0

Finished Thu Jul 13 15:30:38; run time    0:02:18
      8206 calls to Longley-Rice; path distance increment  1.00 km
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Exhibit FLR-2
Olympia, WA Channel 53
July 13, 2000

Fortran Longley-Rice Interference Study
by WES, Inc. Broadcast Consultants

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Run begins Sun Nov 15 17:10:50 1998, host providence
Analysis of: 53N WA SEATTLE
                                    POPULATION   AREA (sq km)
   within Noise Limited Contour       2881925       33939.5
   not affected by terrain losses     2674679       25593.0
   lost to NTSC IX                     334840         790.1
   lost to additional IX by ATV             0           0.0
   lost to all IX                      334840         790.1

Finished Sun Nov 15 17:13:25; run time    0:02:26
     10521 calls to Longley-Rice; path distance increment  1.00 km
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